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July 5, 2018

BY ECF

The Honorable William H. Pauley III
United States District Court, S.D.N.Y.
500 Pearl Street
New York, NY 10007

MEMO ENDORSED

Re: Cengage Learning, Inc. v. Book Dog Books, LLC, No. 16-cv-7123-WHP-GWG, John Wiley & Sons, Inc. v. Book Dog Books, LLC, No. 13-cv-816-WHP-GWG

Dear Judge Pauley:

We write on behalf of Defendants. In accordance with Section V(A) of this Court's Individual Practices, we request permission to file unredacted copies of three declarations – two from Phil Smyres, and one from Sheryl Cox – and their accompanying documents under seal. We also request permission to file an unredacted copy of Defendants' Memorandum of Law in Support of their Motion for a Stay Pending Appeal under seal.

These documents set forth confidential information concerning Defendants' financial condition, assets, liabilities, and ability to pay any judgment entered in this action. Accordingly, they constitute both private financial information and competitively sensitive business information appropriately submitted under seal.

Contemporaneous with this submission, we have delivered unredacted copies of these documents to chambers via email, as directed by this Court's Rules.

Respectfully submitted,

/s/ Evan Mandel

Evan Mandel

cc: Counsel of Record (via ECF)

Application granted.

SO ORDERED:

Dated: July 9, 2018
New York, New York


WILLIAM H. PAULEY III
U.S.D.J.